



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100, BOSTON, MASSACHUSETTS 02109-3912

Certified Mail – Return Receipt Requested

APR 17 2013

Mr. Mark J. Sciota
Deputy Town Manager and Town Attorney
Town of Southington
for Southington Public Schools
200 North Main Street
Southington, Connecticut 06489

Re: PCB Cleanup and Risk-Based Storage for Disposal Approval under
§§ 761.61(a) and (c) and § 761.62(c)
John F. Kennedy Middle School and Joseph A. DePaolo Middle School

Dear Mr. Sciota:

This is in response to the Notifications¹ by Southington Public Schools (SPS) for approval of plans to address PCB-contamination at the John F. Kennedy Middle School (Kennedy School) located at 1701 South Main Street in Plantsville, Connecticut and the Joseph A. DePaolo Middle School (DePaolo School) located at 385 Pleasant Street in Southington, Connecticut ("School" or together, "Schools"). The Schools contain PCB-contaminated materials that exceed the allowable PCB levels under 40 CFR § 761.20(a), § 761.61, and § 761.62. Specifically, PCBs have been found in caulk, glazing, and mastic, in building substrates, and in asphalt and concrete.

SPS has proposed PCB cleanup plans that include removal of non-liquid products that have PCB concentrations greater than or equal to (\geq) 50 parts per million (ppm); removal of PCB-contaminated building substrates, asphalt, and concrete with PCB concentrations greater than ($>$) 1 ppm; and, in-place management of the \geq 50 ppm PCB vapor barrier/mastic located between the exterior walls and interior walls, unless a wall will be disturbed or demolished as part of the renovation activities.

SPS has determined that certain mastic, glazing and caulk, which have PCB concentrations at less than ($<$) 50 ppm are *Excluded PCB Products* as defined under 40 CFR §761.3. Under the PCB regulations, *Excluded PCB Products* are authorized for use (no requirement to remove or dispose of the products) and thus there is no requirement to decontaminate surfaces that are in

¹ Information was submitted by HYGENIX, Inc. on behalf of Southington Public Schools to support a PCB cleanup and risk-based storage for disposal approach for *PCB remediation waste* and *PCB bulk product waste* under 40 CFR §§ 761.61(a) and (c) and § 761.62(c). Attachments 2 and 3 contain a list of submitted documents. These submissions will be referred to as the "Notification" or together, "Notifications".

contact with these building products. However, as indicated in the Notifications, SPS is proposing to remove and dispose of these products under the Connecticut Department of Energy and Environmental Protection (CTDEEP) requirements as part of the renovation work.

With the exception of the post-cleanup verification sampling requirements under § 761.61(a)(6) and removal of the vapor barrier/mastic located between the exterior and interior walls, the proposed PCB cleanup and disposal plan is consistent with the requirements for removal/disposal of *PCB bulk product waste* disposal under § 761.62 and for cleanup and disposal of PCB-contaminated *non-porous surfaces* and *porous surfaces* under § 761.61(a). SPS has proposed a deviation from the verification sampling requirements under § 761.61(a)(6) for *non-porous surfaces* and *porous surfaces*.

Based on the data to date and the proposed cleanup and removal plans, the alternative sampling plans for both Schools appear reasonable for purposes of determining if the PCB cleanup standard has been met. EPA finds that the alternative sampling will not create an unreasonable risk of injury to public health or the environment and EPA may approve the alternative verification sampling under § 761.61(c).

EPA also has determined that temporary in-place storage for disposal of the vapor barrier/mastic will not present an unreasonable risk of injury to public health or the environment given its location. EPA may approve the temporary storage for disposal of the vapor barrier/mastic under § 761.62(c).

SPS may proceed with its project in accordance with 40 CFR §§ 761.61(a) and (c); § 761.62(c); its Notifications; and, this Approval, subject to the conditions of Attachment 1. Please be aware that EPA is requiring monitoring of indoor conditions at the Schools during the period while the vapor barrier/mastic remains in storage for disposal under this Approval. EPA is reserving its rights to require additional investigation or mitigation measures at a School should the monitoring results indicate an unreasonable risk of injury to School users.

EPA expects SPS to continue its ongoing outreach to the Schools' users as well as to other interested stakeholders. This Approval requires that the Schools' monitoring plan(s) include a community outreach component (see Attachment 1, Condition 16).

Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

Please be aware that approval for the temporary storage for disposal of the vapor barrier/mastic shall expire on June 1, 2023. An extension to this timeframe may be requested pursuant to Attachment 1, Condition 1.

Sincerely,



James T. Owens, III
Director, Office of Site Remediation & Restoration

cc J. Twitchell, HYGENIX
G. Trombly, CTDEEP
B. Toal, CTDPH
D. Hockey, EPA HQ
L. Vendinello, EPA HQ
File

Attachments 1 through 3

ATTACHMENT 1

PCB CLEANUP AND STORAGE FOR DISPOSAL APPROVAL CONDITIONS

Joseph A. DePaolo Middle School, 385 Pleasant Street, Southington, CT
John F. Kennedy Middle School, 1071 South Main Street, Plantsville, CT
("School" or together, "Schools")

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB bulk product waste* and the *PCB remediation waste* located at the Schools as identified in the Notifications.¹
 - a. This Approval shall expire on June 1, 2023 unless revoked, suspended, modified, extended or terminated.
 - b. Southington Public Schools (SPS) shall submit a PCB cleanup and disposal plan under § 761.61 and § 761.62 to address the PCB contamination associated with the vapor barrier/mastic located between the exterior and interior walls at the Schools at least 90 days prior to the expiration date of this Approval.
 - i) SPS may conduct cleanup and removal of the vapor barrier/mastic and associated PCB-contaminated building substrates (e.g., inner walls) in a phased approach. SPS may submit a separate PCB cleanup plan in accordance with 40 CFR Part 761 or SPS may submit a modification to its Notification(s) in accordance with Condition 17.
 - ii) In the event that SPS conducts any renovation or demolition activities at a School that would impact the vapor barrier/mastic, SPS shall be required to notify EPA and to submit a separate PCB cleanup plan in accordance with 40 CFR Part 761 or SPS may submit a modification to its Notification(s) in accordance with Condition 17.
 - c. Request for an extension of this Approval or for submittal of the PCB cleanup and disposal plan shall be made in writing at least 120 days prior to the expiration date or prior to the date of the proposed work, whichever occurs first. Request for an extension of this Approval shall include a justification for the extension. EPA may require the submission of additional information in connection with any extension request.

¹ Information was submitted by HYGENIX, Inc. on behalf of Southington Public Schools to support a PCB cleanup and risk-based storage for disposal approach for *PCB remediation waste* and *PCB bulk product waste* under 40 CFR §§ 761.61(a) and (c) and § 761.62(c). Attachments 2 and 3 contain a list of submitted documents. These submissions will be referred to as the "Notification" or together, "Notifications".

2. SPS shall conduct on-site activities in accordance with the conditions of this Approval and with the Notifications.
3. In the event that the plan and activities described in the Notifications differ from the conditions specified in this Approval, the conditions of this Approval shall govern. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.
4. SPS is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in PCB maintenance, abatement, or remedial activities conducted at the Site. If at any time SPS has or receives information indicating that SPS or any other person has failed, or may have failed, to comply with any provision of this Approval or the federal PCB regulations under 40 CFR Part 761, it must report the information to EPA in writing within 24 hours of having or receiving the information.
5. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release SPS from compliance with any applicable requirements of federal, state or local law; or 3) release SPS from liability for, or otherwise resolve any violations of federal, state or local law.
6. SPS must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes that may be generated at the Site during renovation or maintenance activities while this Approval is in force. In the event of a new spill or release of PCBs during maintenance, renovation, abatement, or remedial activities, SPS shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.
7. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761 Subpart D.

NOTIFICATION AND CERTIFICATION CONDITIONS

8. This Approval may be revoked if the EPA does not receive written notification from SPS of its acceptance of the conditions of this Approval within 10 business days of receipt.

9. Prior to initiating onsite work at a School under this Approval, SPS shall submit the following information for EPA review and/or approval:
 - a. a certification signed by its selected contractor, stating that the contractor(s) has read and understands the Notifications, and agrees to abide by the conditions specified in this Approval;
 - b. a contractor work plan, prepared and submitted by the selected contractor(s), detailing the procedures that will be employed for removal of PCB-contaminated materials, for containment design, and for air monitoring during cleanup and handling of PCB-containing materials. This work plan should also include information on waste storage, handling, and disposal for each waste stream type and for equipment decontamination; and,
 - c. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical methods and quality assurance requirements specified in the Notifications and in this Approval.

CLEANUP AND STORAGE FOR DISPOSAL CONDITIONS

10. To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools or construction of a negative air containment system with a HEPA ventilation system to control emissions, shall be utilized during removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.
11. PCB-contaminated materials shall be decontaminated and confirmatory sampling and analysis shall be conducted as described below:
 - a. All visible residues of *PCB bulk product waste* (e.g., mastic, caulk, and glazing) shall be removed as described in the Notification.
 - b. The PCB decontamination standard for *porous surfaces* (e.g., block, brick, asphalt, concrete) shall be less than or equal to (\leq) 1.0 part per million (ppm) as specified in the Notifications.
 - i) All post-decontamination verification sampling of *porous surfaces* shall be performed on a bulk basis (i.e., mg/kg). Samples shall be collected in accordance with the EPA Region 1 *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4, May 5, 2011*, at a maximum sampling depth interval of 0.5 inches and at the frequency detailed in the Notifications.

- ii) Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction/analytical method(s) is validated according to Subpart Q.
 - iii) In the event **any** verification sample is greater than ($>$) 1.0 ppm, SPS shall contact EPA to determine what modifications, if any, need to be made to the sampling plan or frequency or to the cleanup and disposal plan(s) for the remainder of the project.
- c. The decontamination requirement for *non-porous surfaces* (e.g., steel lintels, metal columns) shall be as follows:
- i) The decontamination wipe standard for *non-porous surfaces* shall be less than or equal to (\leq) $1\ \mu\text{g}/100\ \text{cm}^2$.
 - ii) Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction/analytical method(s) is validated according to Subpart Q.
 - iii) All post-decontamination sampling of *non-porous surfaces* shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e. $\mu\text{g}/100\ \text{cm}^2$) and at the frequency detailed in the Notifications.
 - iv) For decontaminated *non-porous surfaces* that have PCB concentrations exceeding the decontamination standard, SPS may conduct additional decontamination to achieve the required decontamination standard, may propose a modification to the cleanup and disposal plan(s) pursuant to Condition 17, or must store and dispose of these materials as TSCA-regulated waste in accordance with 40 CFR Part 761.
- d. SPS shall submit a long-term monitoring plan (MP) for indoor air to support the temporary storage for disposal of the vapor barrier/mastic located between the exterior and interior walls at both Schools. (See Condition 16).

12. Initial indoor air and surface sampling for PCBs shall be conducted following cleanup and removal of PCB-contaminated materials to determine the efficacy and effectiveness of the cleanup and removal actions at the Schools.
 - i) Post-abatement air and surface wipe sampling
 - (1) Indoor air sampling shall be conducted in accordance with EPA Method TO-4A or TO-10A. Sufficient sample volumes shall be collected to provide a minimum laboratory reporting limit of $< 0.05 \mu\text{g}/\text{m}^3$ for total PCBs. At a minimum, PCB analysis shall include PCB homologues and/or PCB congeners.
 - (2) Wipe sampling of indoor surfaces shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e., $\mu\text{g}/100 \text{ cm}^2$). Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846 and chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another method(s) is validated according to Subpart Q.
 - (3) In the event that PCB concentrations in the wipe samples are greater than or equal to (\geq) $1 \mu\text{g}/100 \text{ cm}^2$ or air sample results are greater than ($>$) $0.30 \mu\text{g}/\text{m}^3$, SPS shall contact EPA for further discussion and direction on alternatives, which may include development of a site-specific risk exposure assessment.
13. All PCB waste (regardless of concentration) generated as a result any activity that disturbs PCB-contaminated materials at the Site, including but not limited to maintenance, renovation, abatement, or remedial activities, shall be marked in accordance with § 761.40; stored in a manner prescribed in § 761.65; and, disposed of in accordance with 40 CFR § 761.61 or § 761.62, unless otherwise specified below:
 - a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g).
 - b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).
 - c. PCB-contaminated water generated during decontamination shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under § 761.60.

DEED RESTRICTION AND USE CONDITIONS

14. Within sixty (60) days of completing the activities described in the School's Notification and authorized under this Approval, SPS shall submit for EPA review and approval, a draft deed restriction for the School. The deed restriction shall include: a description of the extent and levels of contamination at the School following cleanup and removal of PCB-containing materials; a description of the actions taken at the School; a description of the use restrictions for the School, as applicable; and the long-term, monitoring requirements for indoor air, which may be addressed by the long-term monitoring plan ("MP", see Condition 16). Within seven (7) days of receipt of EPA's approval of the draft deed restriction, SPS shall record the deed restriction. A copy of this Approval shall be attached to the deed restriction.
15. SPS shall notify the EPA of the potential sale, lease or transfer of any portion of a School, in writing, no later than ninety (90) days prior to such action. This notification shall include the name, address, and telephone number of the new owner(s). In the event that SPS sells, leases, or transfers any portion of the School where the vapor barrier/mastic remains in-place, SPS and/or the new owner shall be required to develop a plan to address the vapor barrier/mastic in accordance with § 761.61 and § 761.62.

INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

16. Within sixty (60) days of receipt of this Approval, SPS shall submit for EPA's review and approval, a long-term MP for indoor air. SPS shall incorporate any changes to the MP required by EPA.
 - a. The MP shall include: a description of the activities that will be conducted, including sampling protocols, sampling frequency, and analytical criteria and, reporting requirements.
 - b. The MP shall include a communications component which details how the monitoring results will be communicated to the School users, other on-site workers, and interested stakeholders.
 - c. SPS shall submit the monitoring results to EPA. Based on its review of the monitoring results, EPA may determine that modification to the MP is necessary in order to support the in-place temporary storage for disposal of vapor barrier/mastic.
 - d. Activities required under the MP shall be conducted until such time that EPA determines, in writing, that such activities are no longer necessary.

17. Any modification(s) in the plan, specifications, or information submitted by SPS, contained in the Notifications, and forming the basis upon which this Approval has been issued, must receive prior written approval from the EPA. No action may be taken to implement any such modification unless the EPA has approved of the modification, in writing. The EPA may request additional information in order to determine whether to approve the modification. If such modification involves a change in the use of the School(s) which results in exposures not considered in the Notification(s), the EPA may revoke, suspend, and/or modify this Approval upon finding that this cleanup and risk-based storage for disposal approval may pose an unreasonable risk of injury to health or the environment due to the change in use. EPA may take similar action if the EPA does not receive requested information needed from SPS to make a determination regarding potential risk.
18. Any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
19. Any misrepresentation or omission of any material fact in the Notifications or in any future records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
20. Approval for these activities may be revoked, modified or otherwise altered: if EPA finds a violation of the conditions of this Approval or of 40 CFR Part 761, including EPA's PCB Spill Cleanup Policy, or other applicable rules and regulations; if EPA finds that these activities present an unreasonable risk to public health or the environment; or if EPA finds that changes are necessary to comply with new rules, standards, or guidance for such approvals. SPS may apply for appropriate modifications in the event new rules, standards, or guidance comes into effect.
21. SPS shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by SPS to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.

RECORDKEEPING AND REPORTING CONDITIONS

22. SPS shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the cleanup measures and the analytical sampling shall be established and maintained by SPS in one centralized location, until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection to authorized representatives of EPA.
23. SPS shall submit a Final Completion Report (Report) for each School to the EPA within 120 days of completion of the activities described in the Notification and authorized under this Approval. At a minimum, each School's Report shall include: a discussion of the project activities; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCBs removed and disposed off-site; copies of manifests; and, copies of certificates of disposal or similar certifications issued by the disposer, if applicable. The Report shall also include a copy of the recorded deed restriction and a certification signed by a SPS official verifying that the authorized activities have been implemented in accordance with this Approval and the Notification.
24. As required under Condition 16 of this Approval, SPS shall submit the results of the long-term monitoring activities to EPA as specified in the final MP to be approved by EPA.
25. Required submittals shall be mailed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527
26. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

END OF ATTACHMENT 1

ATTACHMENT 2

PCB Cleanup and Risk-Based Storage for Disposal Submittals

Joseph A. DePaolo Middle School, 385 Pleasant Street, Southington, Connecticut

- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). Email Transmittal. Sampling Summaries for JFK & DePaolo Middle Schools. November 5, 2012*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). PCB Cleanup and Disposal Notification, Joseph A. DePaolo Middle School, 385 Pleasant Street, Southington, CT. November 25, 2012*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). PCB Containing Vapor Barrier, John F. Kennedy & Joseph A. DePaolo Middle School, Plantsville & Southington, CT. November 29, 2012*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). Email Transmittal. Cost Estimates for PCB Abatement for DePaolo and Kennedy Middle Schools. January 10, 2013*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). Email Transmittal. Joseph A. DePaolo Site Figures. January 30, 2013*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). Email Transmittal. Joseph A. DePaolo Sampling Locations. January 31, 2013*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). 1st Revision to PCB Cleanup and Disposal Notification and Response to EPA Comments, Joseph A. DePaolo Middle School, 385 Pleasant Street, Southington, CT. February 18, 2013*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). 2nd Revision to PCB Cleanup and Disposal Notification and Response to EPA Comments, Joseph A. DePaolo Middle School, 385 Pleasant Street, Southington, CT. February 27, 2013*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). Email Transmittal. Southington Public Schools contact information. March 13, 2013*
- *Mark Sciota (Southington Public Schools) to Kimberly N. Tisa (EPA). Email Transmittal. Summary of PCB Community Outreach. March 22, 2013.*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). Email Transmittal. 3rd Revision to PCB Cleanup and Disposal Notification and Response to EPA Comments, Joseph A. DePaolo Middle School, 385 Pleasant Street, Southington, CT. March 27, 2013*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). Email Transmittal. 4th Revision to PCB Cleanup and Disposal Notification, Joseph A. DePaolo Middle School, 385 Pleasant Street, Southington, CT. April 10, 2013*

ATTACHMENT 3

PCB Cleanup and Risk-Based Storage for Disposal Submittals

John F. Kennedy Middle School, 1701 South Main Street, Plantsville, Connecticut

- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). Email Transmittal. Sampling Summaries for JFK & DePaolo Middle Schools. November 5, 2012.*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). PCB Cleanup and Disposal Notification, John F. Kennedy Middle School, 1701 South Main Street, Plantsville, CT, November 27, 2012*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). PCB Containing Vapor Barrier, John F. Kennedy & Joseph A. DePaolo Middle School, Plantsville & Southington, CT, November 29, 2012*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). Email Transmittal. Cost Estimates for PCB Abatement for DePaolo and Kennedy Middle Schools. January 10, 2013.*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). Email Transmittal. John F. Kennedy Site Figures. January 30, 2013*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). Email Transmittal. John F. Kennedy Sampling Locations. January 31, 2013*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). 1st Revision to PCB Cleanup and Disposal Notification and Response to EPA Comments, John F. Kennedy Middle School, 1701 South Main Street, Plantsville, CT, February 14, 2013*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). 2nd Revision to PCB Cleanup and Disposal Notification and Response to EPA Comments, John F. Kennedy Middle School, 1701 South Main Street, Plantsville, CT, February 27, 2013*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). Email Transmittal. Southington Public Schools contact information. March 13, 2013.*
- *Mark Sciota (Southington Public Schools) to Kimberly N. Tisa (EPA). Email Transmittal. Summary of PCB Community Outreach. March 22, 2013.*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). Email Transmittal. 3rd Revision to PCB Cleanup and Disposal Notification and Response to EPA Comments, John F. Kennedy Middle School, 1701 South Main Street, Plantsville, CT, March 26, 2013*
- *James Twitchell (HYGENIX Inc.) to Kimberly N. Tisa (EPA). Email Transmittal. 4th Revision to PCB Cleanup and Disposal Notification, John F. Kennedy Middle School, 1701 South Main Street, Plantsville, CT, April 10, 2013*